

The Honorable Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

KYLE GIANIS,

Defendant.

NO. CR04-334RSM

UNITED STATES' SECOND
AMENDED EXHIBIT LIST

The United States of America reserves the right to introduce the following exhibits
at trial during its case in chief:

1. Photograph of front of David Youngberg's white Pontiac Sunbird..
2. Photograph of side of David Youngberg's white Pontiac Sunbird.
3. Photograph of closed trunk of David Youngberg's white Pontiac Sunbird.
4. Photograph of open trunk of David Youngberg's white Pontiac Sunbird and
contents.
5. Close up photograph of blue barrels in trunk of Sunbird.
6. Photograph of blue barrel, closed, outside trunk.
7. Photograph of open blue barrel and contents.
8. Close-up of red "Caution" label on blue barrel.
9. Photograph of pellet gun found in Sunbird.

10. Tsoukalas Customs Declaration Form.
11. Youngberg Customs Declaration Form.
12. Handwritten address book and recent calls from Adam Tsoukalas' cell phone.
13. Handwritten address book and recent calls from David Youngberg's cell phone.
14. Plea Agreement of Adam Tsoukalas.
15. Plea Agreement of David Youngberg.
16. Tsoukalas Record of Sworn Statement in Administrative Proceedings (for identification purposes only).
17. Youngberg Record of Sworn Statement in Administrative Proceedings (for identification purposes only).
18. Ephedrine (formerly identified as DEA Drug Exhibit 1).
19. Photograph of blue barrels and ephedrine at DEA lab.

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20. Video Recording of Deposition of Adam Tsoukalas, Part 1.
21. Video Recording of Deposition of Adam Tsoukalas, Part 2.
22. Video Recording of Deposition of David Youngberg, Part 1.
23. Video Recording of Deposition of David Youngberg, Part 2.
24. Adam Tsoukalas' Cell Phone.
25. David Youngberg's Cell Phone.

DATED this 30th day of May, 2008.

Respectfully submitted,

JEFFREY C. SULLIVAN
United States Attorney

/s Vincent T. Lombardi
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CERTIFICATE OF SERVICE

I hereby certify that on May 30, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the attorney(s) of record for the defendant(s). I hereby certify that I have served the attorney(s) of record for the defendant(s) that are non CM/ECF participants via telefax.

s/ Stephanie J. Orona
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